

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
LUFKIN DIVISION**

| | | |
|--|---|-----------------------------|
| JOSE MANUEL REQUENA and |) | |
| OSCAR REQUENA, Individually and |) | |
| On Behalf of the Estate of Maria Hernandez, |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| vs. |) | Case No. 9:20-CV-147 |
| |) | |
| PILGRIM’S PRIDE CORPORATION, |) | |
| |) | |
| Defendant |) | |

**AGREED MOTION FOR ENTRY OF
AGREED PROTECTIVE ORDER**

Plaintiffs Jose Manuel Requena and Oscar Requena, individually and on behalf of the Estate of Maria Hernandez (collectively, “Plaintiffs”), and Defendant Pilgrim’s Pride Corporation (“Pilgrim’s” and together with Plaintiffs referred to as “Parties”) respectfully request that the Court enter the Agreed Protective Order jointly prepared by the Parties and state as follows:

1. The Parties agree to the relief requested in this motion.
2. The Parties diligently worked through issues of how to handle documents and other information containing confidential material, trade secrets, and proprietary information in this commercial dispute. The Agreed Protective Order sets forth the Parties’ agreements.
3. The Parties respectfully request that the Court enter the Agreed Protective Order attached hereto as Exhibit “A” and presented separately to the Court by email.

Respectfully submitted,

/s/ William R. Langley

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**ATTORNEYS FOR DEFENDANT
PILGRIM'S PRIDE CORPORATION**

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically on September 15, 2020. As such, this document was served on all counsel of record who are deemed to have consented to electronic service.

/s/ Clayton E. Bailey
Counsel for Pilgrim's Pride Corporation